



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM/MEM
F. #2017R00509

*271 Cadman Plaza East
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By Email and ECF

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Re: United States v. Karl Jordan, Jr., et al.
Criminal Docket No. 20-305 (LDH)

Dear Counsel:

Enclosed please find the government's supplemental discovery production for defendants Karl Jordan, Jr. and Ronald Washington in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Items Bates numbered KJ 4756 – KJ 4873 and RW 18 – RW 46 are being produced to defendant Jordan, and items Bates numbered KJ 1 – 4, KJ 9 – 89 and KJ 117 – 4755 are being produced to defendant Washington. Some of these items

are marked “sensitive” under the terms of the Stipulation and Protective Order issued on September 17, 2020. As with all discovery materials provided by the government that contain personal identifying information regarding specific individuals and uncharged third parties, any filings pertaining to discovery materials must comply with Rule 49.1(a) and other applicable law.

Pursuant to Rule 16(b)(1)(C), the Government reiterates its demand for reciprocal notice regarding any expert witness that any of the defendants intends to rely upon. The Government also repeats its request for reciprocal discovery under Fed. R. Crim. P. 16(b).

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Artie McConnell
Artie McConnell
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cc: Clerk of the Court (LDH) (by ECF) (without enclosures)